

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

WILLIE LEE POOLE,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; et al.,

Defendants.

CIVIL ACTION NO. 2:05-CV-774

COUNTY OF CHEROKEE

STATE OF GEORGIA

AFFIDAVIT OF ROBERT S. RITTER

Robert S. Ritter, under oath, states as follows:

1. My name is Robert S. Ritter. The statements made in this declaration are based upon my own personal knowledge as more specifically set forth below and, if sworn as a witness, I could testify competently to them.

2. I serve as Director of Operations for the State of Alabama and am an officer of American General Financial Services, Inc. ("American General").

3. Latanya Kennedy, one of two individual defendants in the above-styled matter, was not employed by American General at the time of Willie Poole's June 15, 1990 loan.

4. Kathie Rowell, the other individual defendant in the above-styled matter, has not been employed by American General since April of 2000.

5. In fact, none of the individuals employed at American General's Auburn branch at the time of Willie Poole's June 15, 1990 loan are employed there today.

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FURTHER AFFIANT SAYETH NOT.

This the 27th day of February, 2006.



Robert S. Ritter

SWORN TO AND SUBSCRIBED BEFORE ME, this the 27th day of February, 2006.



NOTARY PUBLIC

My Commission Expires:

My Commission Expires August 11, 2006

